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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

LUCA INTERNATIONAL GROUP, LLC;
LUCA RESOURCES GROUP, LLC;
LUCA ENERGY FUND, LLC;
ENTHOLPY EMC, INC.; BINGQING
YANG; LEI (LILY) LEI; ANTHONY V.
POLLACE; and YONG (MICHAEL)
CHEN,

Defendants, and

LUCA OPERATION, LLC; LUCA
BARNETT SHALE JOINT VENTURE;
LUCA TO-KALON ENERGY, LLC;
LUCA OIL, LLC; LUCA I, LIMITED
PARTNERSHIP; LUCA OIL II JOINT
VENTURE; J&Q INT'L TRADING, INC.;
SKYLINE TRADING, LLC; and XIANG
LONG ZHOU,

Relief Defendants.

Case No. 3:15-cv-03101 CRB

**STIPULATION BY PLAINTIFF
SECURITIES AND EXCHANGE
COMMISSION AND DEFENDANT LEI
(LILY) LEI TO ENTRY OF PROPOSED
ORDER GRANTING PRELIMINARY
INJUNCTION AND ORDERING OTHER
ANCILLARY RELIEF AND TO EXTEND
OPPOSITION DATE FOR OTHER RELIEF**

Date: NA
Time: NA
Judge: Charles R. Breyer
Courtroom: 6 (17th Floor)

STIPULATION

Plaintiff Securities and Exchange Commission, by and through its counsel of record, and defendant Lei (Lily) Lei ("Lei"), by and through her counsel of record, hereby stipulate as follows:

1. The Court may enter the attached Order Granting Preliminary Injunction and Ordering Other Ancillary Relief enjoining Lei from engaging in specified conduct, prohibiting the destruction of documents, and granting expedited discovery, pending further orders by the Court.

2. Lei may have an extension from July 31, 2015 to August 7, 2015 to file and serve an opposition to the portions of the relief sought in Plaintiff's Motion for Preliminary Injunction and Other Ancillary Relief to which the parties have not stipulated in the attached Order Granting Preliminary Injunction and Ordering Other Ancillary Relief. The parties also stipulate that Plaintiff's reply to any opposition papers by Lei will be filed and served on August 14, 2015. The parties to this Stipulation agree to advancing the hearing on Plaintiff's Motion for Preliminary Injunction and Other Ancillary Relief from Wednesday, September 2, 2015 to such date and time at the Court's earliest convenience on or after August 17, 2015.

DATED: July 31, 2015

Respectfully Submitted,

/s/ John S. Yun

John S. Yun
Attorney for Plaintiff Securities and Exchange
Commission

VICK LAW GROUP

/s/ Scott Vick

Scott Vick
Attorney for Defendant Lei (Lily) Lei

1 IT IS SO ORDERED:

2 The hearing on Plaintiff's Motion for Preliminary Injunction and Other Ancillary Relief
3 remains on Wednesday, September 2, 2015 at 2:00 p.m.

4 Date: August 3, 2015

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Hon. Charles R. Breyer